

David.Butler

NPI 2012-21-C
244650

From: TURNER, PATRICK W (Legal) <pt1285@att.com>
Sent: Thursday, June 13, 2013 2:47 PM
To: Joseph.Melchers
Cc: Amy Putnam (amy.putnam@neustar.biz); Daphne.Duke; David.Butler; Belser, Florence; Jocelyn.Boyd; John Manning (john.manning@neustar.biz); Joseph.Melchers; Kimberly Miller (Kimberly.Miller@neustar.biz); Hammonds, Lessie; Randall.Dong; Thomas Foley (Thomas.Foley@neustar.biz); Wayne Milby (wayne.milby@neustar.biz)
Subject: Request for Expedited Extension of Numbering Resource Deadline
Attachments: Scan 001.pdf

Joseph:

As explained in more detail below, SBC Internet Services, Inc. d/b/a AT&T Internet Services ("AT&T") respectfully seeks a 90-day extension of the deadline to activate numbering resources in Beech Island. Unfortunately, this deadline expires tomorrow. Accordingly, I have copied the Office of Regulatory Staff, the North American Numbering Plan Administrator (NANPA), and the Pooling Administrator on this request. If a formal Commission vote is required, we respectfully request that this matter be placed on the June 19, 2013 Agenda for action by the Commission.

As background, on October 9, 2012, AT&T notified the Commission of its intent to request numbering resources in the Beech Island rate center. See <http://dms.psc.sc.gov/pdf/matters/C4E4308F-155D-141F-1D43CB9A386C3926.pdf>. The numbering administrator activated those numbering resources effective December 14, 2012, see Attachment 1 (in the pdf attached to this email), and the FCC's regulations require AT&T to either activate those resources within six months of that date, obtain an extension of that deadline from the Commission, or return the numbering resources to the NANPA or the Pooling Administrator. See Attachment 2, 47 C.F.R. §§52.15(1), (4)-(6). The Commission may extend the deadline based on AT&T's explanation of the circumstances causing the delay in activating and commencing assignment of the numbering resources. *Id.*, §52.15(4).

AT&T has not yet activated these numbering resources due to an unanticipated delay in provisioning facilities needed to offer services, but those delays have been resolved, AT&T is actively marketing services in this area, and we anticipate receiving service orders in the near future. If this extension is not granted, it will take AT&T approximately two months to reacquire the numbering resources, which would hinder AT&T's ability to offer service. Therefore, AT&T respectfully requests that the Commission grant a 90-day extension to allow AT&T to utilize rather than lose the numbering resources.

As information, AT&T has discussed the issue with the Office of Regulatory Staff, and it does not oppose this request. Additionally, based on our prior experiences seeking these types of extensions, we do not anticipate any objection from NANPA or the Pooling Administrator.

I appreciate your attention to this request, and if a conference call with the recipients of this email would be beneficial, please let me know and my office can set one up.

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